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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

DEFENDANT'S POST-TRIAL
MOTION TO DISMISS

EVIDENTIARY HEARING
REQUESTED

Defendant, Pirouz Sedaghaty, through counsel Lawrence Matasar and Steven T. Wax, hereby moves this Court to dismiss the indictment in the above

referenced case based on outrageous government conduct. In January, 2011, Mr. Sedaghaty filed a Supplement to Motion For New Trial, Motion For Release, Post-Trial Motion For Discovery, and Supplement to those pleadings in which he set out the facts as he then understood them from the government regarding: 1) payments and an offer of payment to a critical witness and her husband and the failure of the government to provide that information in discovery; 2) discrepancies in F.B.I. 302 reports; and 3) the conduct of the investigation into those matters. He relies on those pleadings and incorporates them herein by reference. The February 18 filings by the government provide further support for this motion. However, they also raise substantial new questions. A memorandum of law in support of this motion will be filed after discovery, investigation, and an evidentiary hearing.

Respectfully submitted this 22ND day of February, 2011.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence Matasar

Lawrence Matasar